

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No.

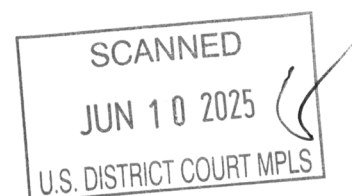
UNITED STATES OF AMERICA,)	
)	<i>CR 25-228 KMM</i>
Plaintiff,)	INFORMATION
v.)	
)	18 U.S.C. § 371
RONNIE WILLIAMS (a/k/a)	52 U.S.C. § 20511(2)(A)
"MICHAEL GIBSON"),)	
)	
Defendant.)	

THE UNITED STATES CHARGES THAT:

INTRODUCTION

At all times material to this Information:

1. Foundation 1 was an entity seeking to register voters in the State of Minnesota.
2. Defendant RONNIE WILLIAMS (a/k/a "MICHAEL GIBSON") worked as a paid contractor assisting Foundation 1 with this voter registration campaign.
3. Individual 1 was the defendant's long-time romantic partner.



COUNT ONE
(Conspiracy)

THE CONSPIRACY TO ENGAGE IN VOTER REGISTRATION FRAUD

4. Beginning in or about 2021 and continuing until in or about 2022, in the District of Minnesota and elsewhere, the defendant,

RONNIE WILLIAMS (a/k/a “MICHAEL GIBSON”),

and Individual 1 did knowingly and willfully combine, conspire, and agree together and with each other to knowingly and willfully deprive, defraud, and attempt to deprive and defraud the residents of the State of Minnesota of a fair and impartially conducted election process, in an election for federal office, by procuring and submitting voter registration applications that they knew to be materially false, fictitious, and fraudulent under Minnesota law to various county election offices in the State of Minnesota, all in violation of Title 52, United States Code, Section 20511(2)(A).

MANNER AND MEANS OF THE CONSPIRACY

5. It was part of the conspiracy that

a. WILLIAMS and Individual 1 would generate fictitious names, addresses, dates of birth, telephone numbers, and social security numbers.

b. WILLIAMS and Individual 1 would then fill out voter registration applications with this false information.

c. WILLIAMS or Individual 1 would then sign a form certifying that they “have read and understand this statement” and “that giving false information is a felony punishable by not more than 5 years imprisonment or a fine of not more than \$10,000, or both.”

d. WILLIAMS would then provide the completed forms to Foundation 1, through its agents.

e. Foundation 1, through its agents, would submit these false voter registration applications to county election offices across the State of Minnesota.

f. Foundation 1 would in turn pay WILLIAMS.

g. WILLIAMS would then split the proceeds with Individual 1.

OVERT ACTS

6. To effect the object of the conspiracy, WILLIAMS and Individual 1 committed and caused to be committed the following overt acts, among others, in the District of Minnesota and elsewhere:

a. On or about September 30, 2022, Individual 1 completed a false voter registration application in the name of “Brad Montly.”

b. On or about November 1, 2022, WILLIAMS completed a false voter registration application in the name of “Harry Jhonson.”

7. All in violation of Title 18, United States Code, Section 371.

Dated: June 10, 2025

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